

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUSSEIN KHALAF,

Defendant.

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No. 4:22-CR-00062-HEA-PLC

**MOTION TO MODIFY CONDITIONS OF RELEASE**

NOW COMES Defendant HUSSEIN KHALAF, through counsel, Mohammed G. Ahmed, Assistant Federal Public Defender, requesting this Honorable Court to modify his curfew to allow for him to work. In support, Defendant states the following:

1. Mr. Khalaf has been granted pretrial release in this matter.
2. Currently, Pretrial Services is imposing a 12 hour curfew from 8 am to 8 pm.
3. Mr. Khalaf has been looking for work. The only two jobs that have shown any interest in Mr. Khalaf due to his lack of normal identification, Walmart and American Cleaners, have work schedules of 4pm to 10 pm and 5pm to 11pm.
4. The Court may recall that Mr. Khalaf is not a United States citizen. Since his passport has been seized he has no valid identification other than the pretrial services card.

5. Mr. Khalaf is desperate to earn money as he has extremely limited means and friends to assist him with obtaining groceries and necessities, etc.

WHEREFORE, for the reasons stated above, counsel requests his curfew be changed to accommodate his two potential jobs.

Dated: March 6, 2023

Respectfully submitted,

/s/Mohammed G. Ahmed  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Colleen C. Lang, Assistant United States Attorney.

/s/ Mohammed G. Ahmed  
MOHAMMED G. AHMED  
Assistant Federal Public Defender